

[Service Date December 12, 2005]

December 12, 2005

**NOTICE OF OPPORTUNITY TO COMMENT**  
**(By Tuesday, January 31, 2006)**

Re: Notice of Inquiry into the Public Safety Risks Posed by Small Natural Gas and Propane Gas Pipelines, Docket No. PG-051355

**TO ALL INTERESTED PERSONS:**

The pipeline safety program of the Washington Utilities and Transportation Commission is seeking information about the risks of small gas pipeline systems and possible safety measures that could be taken to mitigate those risks.

For purposes of this inquiry, small gas pipeline systems include all (including public-owned) pipeline systems distributing gas, including propane, to more than one building. Small gas pipeline systems do not include local distribution companies, transmission pipelines or high-pressure or large diameter customer-owned systems.

Currently, the commission's pipeline safety program inspects privately-owned master meter systems. However, there are other small gas systems that do not meet the federal master meter definition yet potentially pose a safety hazard. Furthermore, gas pipeline systems that are publicly-owned or distribute propane gas are currently not inspected or regulated in the same manner as master meter systems. This inquiry is intended to gather information about all small gas pipeline systems with the intention of determining whether any changes are necessary to the state's safety oversight program. This inquiry may inform a future rulemaking and could guide the commission in a request for changes in state law.

We would like your help in providing any information you believe can assist this Notice of Inquiry. The attached discussion paper is intended to foster discussion. Respondents may respond or rebut any statements made in the discussion paper when responding to the following questions:

- 1) What public safety risks do small gas pipeline systems pose? What characteristics described in Section V of the paper and listed here are indicators of risk and why? Are there other risk indicators that are not listed but should be considered?

- a. Number of buildings served
  - b. Underground/exterior pipelines
  - c. Proximity to other buildings, public access
  - d. Resale or customer relationship
  - e. Ownership (public, private)
  - f. Commodity transported
  - g. Pipeline materials
  - h. Number of customers
  - i. Length of exterior pipeline
  - j. Pressure
  - k. System age
- 2) Is it possible to define a category or categories of small gas pipeline systems that pose so little risk that minimal or no regulatory oversight is needed? How would these systems be defined?
  - 3) Does the current federal master meter definition, which is also the state of Washington's definition, cover all small gas pipeline systems that should comply with federal and state pipeline safety requirements?
  - 4) Are there systems that could fall in a range between little to no risk and those that require full oversight? If so, what strategies should be employed to ensure public safety?
  - 5) What alternatives to the current master meter safety requirements could the state employ to minimize the risk associated with small gas pipeline systems?
  - 6) What approaches should be taken to identify and communicate with operators of small gas pipeline systems?
  - 7) How can local natural gas distribution companies help to identify existing small gas pipeline systems?
  - 8) How can other entities, such as local governments, help in identifying new and existing small gas pipeline systems?
  - 9) Please comment on the risks associated with pipeline systems distributing propane gas. Should underground pipeline systems that distribute propane be regulated by the state pipeline safety program (which may require that they also be economically regulated) or should changes be made to allow only for some form of safety regulation? Are there additional issues that should be considered with propane distribution systems?
  - 10) Should small gas pipeline systems be encouraged or required to have their systems or operations taken over by local natural gas distribution companies or other professional pipeline operators? What issues would need to be addressed before implementing such a policy?
  - 11) Should new small gas pipeline systems be banned? What issues would need to be addressed before implementing such a ban?
  - 12) What studies, data or resources can you offer to further the goals of this Notice of Inquiry?

**NOTICE OF OPPORTUNITY TO PARTICIPATE**

Written comments on the discussion paper must be filed with the commission no later than **Tuesday, January 31, 2006**. We request that comments be provided in electronic format to enhance public access, for ease of providing comments, to reduce the need for paper copies, and to facilitate quotations from the comments. Comments may be submitted as electronic files in Word 97 or later or in Adobe Acrobat (.pdf) via the commission's Web Portal or by electronic mail to the commission's Records Center at <[records@wutc.wa.gov](mailto:records@wutc.wa.gov)>. Please include:

- The docket number of this proceeding (PG-051355)
- The commenting party's name
- The title and date of the comment or comments

An alternative method for submitting comments may be by mailing/delivering an electronic copy on a 3 ½ inch, IBM-formatted, high-density disk, in Word 97 or later or in .pdf Adobe Acrobat . Include all of the information requested above. We will post on the commission's web site all comments that are provided in electronic format. The web site is located at <http://www.wutc.wa.gov/051355>.

If you are unable to file your comments electronically or to submit them on a disk, we will always accept a paper document.

If you have any questions regarding the notice of inquiry, please contact Tim Sweeney at [tsweeney@wutc.wa.gov](mailto:tsweeney@wutc.wa.gov) or by calling (360) 664-1118.

Sincerely,

CAROLE J. WASHBURN  
Executive Secretary